

**EXHIBIT A**

Approved, SCAO

Original - Court  
1st Copy- Defendant2nd Copy - Plaintiff  
3rd Copy -Return

<b>STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY</b>	<b>SUMMONS</b>	<b>CASE NO. 20-000741-NI Hon.Muriel Hughes</b>
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Court address : 2 Woodward Ave., Detroit MI 48226

Court telephone no.: 313-224-2415

Plaintiff's name(s), address(es), and telephone no(s)  
Tahiri, Sadet

v

Defendant's name(s), address(es), and telephone no(s).  
Setzer, Richard

Plaintiff's attorney, bar no., address, and telephone no

Brian E. Muawad 41209  
22330 Greater Mack Ave  
Saint Clair Shores, MI 48080-2305

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☒ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☒ this court, ☐ \_\_\_\_\_ Court,where it was given case number 18-008757-NF and assigned to Judge Muriel Hughes.The action ☐ remains ☒ is no longer pending.

Summons section completed by court clerk.

SUMMONS

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date  
1/17/2020Expiration date\*  
4/17/2020Court clerk  
Deborah Bynum

Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (9/19)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



**STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

SADET TAHIRI, An Individual,

Plaintiff,

vs

Case No. 20  
Hon.

NI

RICHARD SETZER, an Individual,  
And MCKENZIE DEVELOPMENT  
CORPORATION d/b/a NATIONAL  
RENTAL, A Foreign Profit Corporation,

Defendants.

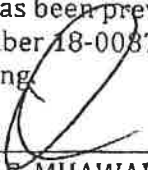
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**COMPLAINT**

A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in Wayne County Circuit Court, where it was given docket number 18-008757-NF and was assigned to Judge Muriel Hughes. The action is no longer pending.

  
\_\_\_\_\_  
BRIAN E. MUAWAD (P 41209)

Plaintiff states:

1. Plaintiff was a resident of County of Wayne, State of Michigan at the time this incident occurred.

2. Defendant, RICHARD SETZER is a resident of the City of Cincinnati,

County of Hamilton, State of Ohio.

3. Defendant, MCKENZIE DEVELOPMENT CORPORATION d/b/a NATIONAL RENTALS is a foreign profit corporation and conducts a regular and systematic part of its business in the County of Wayne, State of Michigan.

4. Jurisdiction exists in this court because of an automobile collision that occurred on July 31, 2017, at approximately 11:37 a.m. in the City of Southfield, County of Oakland, State of Michigan.

5. The amount in controversy is within the jurisdiction of this court because Plaintiff claims damages in excess of \$25,000.

6. At all relevant times, Defendant, MCKENZIE DEVELOPMENT CORPORATION was the sole owner of a 2017 Chevrolet Equinox bearing an Illinois license number ZX97214, vehicle identification number 2GNALCEK1H622986A, which was being driven by Defendant RICHARD SETZOR.

7. At the time of the collision, Plaintiff was driving her vehicle northbound on Southfield Road at the intersection of Anniston, when a vehicle driven by Defendant RICHARD SETZOR was southbound on Southfield Road at the intersection of 10 Mile Road and was turning left into Plaintiff's oncoming vehicle, whereby traffic was letting him through, but did not see Plaintiff's approaching vehicle who had the right of way causing a collision.

8. At that time and place, Defendant, RICHARD SETZOR, was allowed to go through the lanes by other vehicles, but did yield property to Plaintiff's oncoming

vehicle, who had the right of way, striking Plaintiff's vehicle, thereby causing injury to Plaintiff.

9. Defendants, owed Plaintiff the following duties of care:

- a. to operate the motor vehicle on the roadway in a manner and at a rate of speed that would permit it to be stopped within a safe distance, MCL 257.627(1)
- b. not to operate the vehicle carelessly and heedlessly with willful and wanton disregard for the safety and rights of others, MCL 257.626(2)
- c. to keep the automobile constantly under control
- d. to attempt to stop the vehicle when Defendant knew or should have known that failure to do so would naturally and probably result in injury to Plaintiff
- e. to observe the highway in front of Defendant's vehicle when Defendant knew or should have known that failure to observe Plaintiff's oncoming vehicle would endanger the life or property of other persons using the roadway
- f. to come to a full stop before entering the roadway from a private road or driveway and to yield to all approaching vehicles, MCL 257.652

10. As a direct and proximate result of the breach of Defendant driver's duties, the collision occurred and the injuries stated in this complaint resulted.

11. As a direct and proximate result of the negligence of Defendant driver, Plaintiff suffered serious injuries and may in the future suffer or may permanently suffer mental anguish, pain and suffering, injuries, and limitations, including serious impairment of body function or permanent or serious disfigurement and aggravation of any preexisting conditions. Plaintiff's damages include, but are not limited to, the

following injuries:

- a. serious injuries to his back, neck, shoulders, and other parts of his body as well as other related and appreciable difficulties, injuries, or consequences that have occurred, developed, or aggravated any preexisting problem that might have existed
- b. pain, suffering, and mental anguish
- c. wage loss or actual future loss of earnings to the extent that such losses are recoverable in excess of the no-fault statutory monthly and yearly *maximums* that are found to apply to the cause
- d. other damages, injuries, and consequences that are found to be related to the automobile accident that developed during the course of discovery, to the extent that the damages are recoverable under the Michigan No-Fault Insurance Act

**RELIEF REQUESTED**

Plaintiff asks the court to award damages against Defendants, jointly and severally, in whatever amount Plaintiff is found to be entitled to in excess of \$25,000, plus interest, costs, and attorney fees.

Respectfully submitted,

Law Offices of Brian E. Muawad, P.C.

  
\_\_\_\_\_  
BRIAN E. MUAWAD (P 41209)

Attorney for Plaintiff

DATED: January 15, 2020